

1 LENS; is that correct?

2 A. Yes, that's correct.

3 Q. Now, on Page 24 of your rebuttal
4 testimony specifically about the first
5 ten lines or so, you discussed the CGI
6 specification for LENS. And my question
7 is, when did BellSouth complete
8 development of the CGI specification?

9 A. I don't know that I can say that
10 BellSouth completed development of that.
11 BellSouth had it in progress and
12 discontinued work on it in progress
13 because no CLEC was expressing an
14 interest in it. We had had a number of
15 discussions with AT&T about it, and we
16 had kind of stops and starts. And at the
17 point that AT&T told us that they weren't
18 interested in pursuing us, we stopped
19 spending time and money on it. We have a
20 draft version that's available that could
21 be updated and made available, but in the
22 absence of anyone asking for it, that
23 doesn't seem like a prudent use of our

1 resources.

2 Q. Mrs. Calhoun, would you turn to page 24
3 of your rebuttal testimony. At line 23
4 and 24 you say this, AT&T began
5 requesting specifications in 1996; is
6 that correct?

7 A. Yes.

8 Q. Is it your position that AT&T told
9 BellSouth at some point that it no longer
10 wanted a copy of that specification?

11 A. Yes.

12 Q. When was that?

13 A. I believe it was April of this year.

14 Q. Mrs. Calhoun, have you heard Mr. Bradbury
15 testify in regulatory proceedings on this
16 issue that AT&T still wants a copy of
17 that CGI specification?

18 A. I don't recall his specific testimony on
19 that. And let me make sure that we're
20 communicating about this. AT&T, there's
21 a difference between AT&T wanting a copy
22 of the specification, and AT&T telling us
23 that they are actually interested in

1 going forward with this. And what I'm
2 saying is we were told in April of this
3 year by AT&T that they weren't interested
4 in pursuing this.

5 Q. Who told BellSouth that?

6 A. I'll have to double-check.

7 Q. Do you recall a particular date? Just a
8 little more specific than just April?

9 A. Hold on just one second. It would have
10 been on or about April 8th.

11 Q. But as of today there is no completed CGI
12 specification that CLECs could use to
13 develop a software to pull out
14 pre-ordering and ordering interfaces to
15 communicate information directly with
16 each other?

17 A. No. I believe we could update the one we
18 have within 30 days or less.

19 Q. The answer is today it's not complete,
20 but it could be complete in 30 days?

21 A. Yes.

22 Q. Let's go back to cutting and pasting very
23 briefly. Just as an example that would

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of :DOCKET NO. 960786-TL
BellSouth Telecommunications, :
Inc.'s entry into interLATA :
services pursuant to Section 271 :
of the Federal Telecommunications :
Act of 1996. :

THIRD DAY - AFTERNOON SESSION

VOLUME XII

PAGE 1304 through 1379

PROCEEDINGS:

HEARING

BEFORE:

CHAIRMAN JULIA L. JOHNSON
COMMISSIONER J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER DIANE K. KIESLING
COMMISSIONER JOE GARCIA

DATE:

Thursday, September 4, 1997

TIME:

Commenced at 12:00 p.m.

PLACE:

Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY:

NANCY S. METZKE, RPR, CCR

APPEARANCES:

(As heretofore noted.)

| | | |
|----|--|----------|
| 1 | I N D E X | |
| 2 | | PAGE NO. |
| 3 | WITNESSES | |
| 4 | NAME | |
| 5 | GLORIA CALHOUN | |
| 6 | Cross Examination By Mr. Melson | 1307 |
| | Cross Examination By Mr. Willingham. . . . | 1340 |
| 7 | Cross Examination By Ms. Rule | 1344 |
| 8 | | |
| 9 | | |
| 10 | | |
| 11 | | |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
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| 23 | | |
| 24 | | |
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1 Q Did BellSouth at one point commence the
2 development of a CGI system for use with LENS?

3 A BellSouth began the development of a CGI
4 technical specification, but that's something different
5 than building a system. The actual CGI program would be
6 done on the -- or I guess I should say a portion of the
7 programming would be done on the CLEC side of the interface
8 as well.

9 Q Would a portion of the programming be done on
10 BellSouth's side of the interface?

11 A Yes.

12 Q BellSouth -- Let me try and understand.
13 BellSouth began the development of a technical
14 specification for a CGI interface but at some point
15 abandoned that effort; is that correct?

16 A Yes, the effort was abandoned when it appeared
17 that there was not going to be a party pursuing that option
18 with us.

19 Q Now I believe you have testified that a user of
20 LENS might choose to integrate some of the pre-ordering
21 information from LENS with its own EDI system to avoid its
22 customer representative having to move from one system to
23 another; is that correct?

24 A Yes.

25 Q Would that be a CGI application?

1 PLACE: Dobbs Building, Raleigh, North Carolina

2 DATE: Friday, September 26, 1997

3 TIME IN SESSION: 9:00 A.M. TO 4:55 P.M.

4 BEFORE: Commissioner Jo Anne Sanford, Presiding
5 Commissioner J. Richard Conder
6 Commissioner Allyson K. Duncan
7 Commissioner Judy Hunt
8 Commissioner Ralph A. Hunt
9 Commissioner Robert V. Owens, Jr.
10 Commissioner William R. Pittman

11 IN THE MATTER OF:

12 DOCKET NO.: P-55, SUB 1022
13 BellSouth Telecommunications, Inc.
14 BellSouth's In-Region InterLATA Service Pursuant
15 to Section 271 of the Telecommunications Act of 1996

16 Volume 8

17 A P P E A R A N C E S:

18 FOR BELLSOUTH TELECOMMUNICATIONS, INC.:

19 A.S. Povall, Jr., General Counsel-North Carolina
20 William J. Ellenberg, II - General Attorney
21 Edward Rankin, General Attorney and
22 Phil Carver, General Attorney
23 BellSouth Telecommunications, Inc.
24 1521 BellSouth Plaza
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Charlotte, North Carolina 28230

FOR BELLSOUTH LONG DISTANCE, INC.:

Jim Cain and Gray Styers
Kilpatrick Stockton
Attorneys at Law
Post Office Box 300004
Raleigh, North Carolina 27622

| | | |
|----|----------------------------------|-------------|
| 1 | <u>INDEX</u> | |
| 2 | GLORIA CALHOUN | <u>PAGE</u> |
| 3 | Mr. Stoughton (Cross) | 8 |
| 4 | Mr. Fincher (Fur. ross) | 54 |
| 5 | JULIE STROW | |
| 6 | Mr. Canis (Direct) | 64 |
| 7 | Ms. Long (Cross) | 139 |
| 8 | Ms. Rankin (Fur. Cross) | 166 |
| 9 | Mr. Canis (Redirect) | 193 |
| 10 | GLORIA CALHOUN | |
| 11 | Ms. Edwards (Fur. Cross Cont'd.) | 195 |
| 12 | Mr. Campen (Fur. Cross) | 229 |
| 13 | Ms. Long (Fur. Cross) | 264 |
| 14 | Mr. Ellenberg (Redirect) | 275 |
| 15 | Commission (Examination) | 282 |
| 16 | Mr. Melson (Re-cross) | 290 |
| 17 | JERRY MOORE: | |
| 18 | Mr. Rankin (Direct) | 293 |
| 19 | Ms. Rhodes (Cross) | 349 |
| 20 | Mr. Melson (Fur. Cross) | 375 |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |

1 A. No, that -- that's not correct.

2 Q. What has BellSouth published in the nature of
3 specifications for LENS?

4 A. BellSouth provided technical specifications at the
5 request of the Georgia Public Service Commission, in
6 August of 1996, and that consisted of technical
7 information about LENS. And BellSouth also provided
8 what's known as a common gateway interface specification
9 that provided information that would enable a CLP to
10 develop programs to use the data from LENS if they
11 wanted to customize that or intergrate with their own
12 interfaces.

13 Q. In the technical specs that were provided to the
14 Georgia Commission in August of 1996, are those still
15 current?

16 A. Yes.

17 Q. They represent the LENS system as it exists today?

18 A. Well, they represent the technical information
19 that a CLP needs to use in order to gather the
20 information -- the technical information a CLP needs to
21 know in order to use the LENS system.

22 Q. In order to use the LENS system?

23 A. Yes.

24 Q. Would that technical information provided to the

1 Georgia Commission in August '96, would that information
2 be sufficient to permit a CLP to integrate its own
3 systems with LENS and carry over data on a machine to
4 machine basis?

5 A. No, that's the purpose of the common gateway
6 interface, also known as the CGI specification.

7 Q. Okay. Now, is the CGI Specification currently
8 up-to-date?

9 A. No, it's not.

10 BellSouth had begun that effort at the request
11 of AT&T, and earlier this year, AT&T advised us that
12 because we were developing the customized interface at
13 their request that they didn't plan to proceed the CGI
14 method as well, and there was no one else interested --
15 interested in it so we discontinued work on it.

16 Q. And so there is no CGI specification today that
17 represents LENS as it exists today, is that true?

18 A. It's true in that the CGI specification that
19 exists today doesn't represent LENS in its totality.
20 It's -- a very large portion of the work has been done
21 and there's considerable information there. It would
22 require some update if there was someone who was
23 interested in using it, which is as far as we can tell
24 today, there is not.

ATTACHMENT 13



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of
BellSouth Telecommunications
Inc.'s entry into interLATA services
pursuant to Section 271 of the Federal
Telecommunications Act of 1996.

DOCKET NO. 960786-TL

DEPOSITION OF:

WILLIAM N. STACY

TAKEN AT THE
INSTANCE OF:THE STAFF OF THE FLORIDA
PUBLIC SERVICE COMMISSION

PLACE:

GERALD L. GUNTER BUILDING
ROOM 262
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA

TIME:

COMMENCED AT 11:00 A.M.
CONCLUDED AT 6:45 P.M.

DATE

AUGUST 14, 1997

REPORTED BY:

NANCY S. METZKE, RPR, CCR
C & N REPORTERS
POST OFFICE BOX 3093
TALLAHASSEE, FLORIDA 32315

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POST OFFICE BOX 3093
TALLAHASSEE, FLORIDA 32315-3093
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I N D E X

PAGE NO.

| | |
|-----------------------------------|-----|
| STIPULATION | 3 |
| ERRATA SHEET | 178 |
| CERTIFICATE OF DEPONENT | 179 |
| CERTIFICATE OF OATH | 180 |
| CERTIFICATE OF REPORTER | 181 |

WITNESS

WILLIAM N. STACY

| | |
|--|-----|
| Examination by Ms. Culpepper | 7 |
| Examination by Mr. Hoffman | 90 |
| Examination by Ms. Canzano | 107 |
| Examination by Ms. Rule | 107 |
| Examination by Ms. Wilson | 135 |
| Examination by Mr. Melson | 149 |
| Examination by Ms. White | 174 |

1 operating support system.

2 Q Exactly what do you mean by their effort?

3 A Let me use a specific example I've used earlier,
4 the EDI ordering form is the national standard for
5 ordering, and that has been established. There has been no
6 national standard for pre-ordering established, and
7 BellSouth developed LENS as its desire to make the
8 pre-ordering data available to the carriers in
9 substantially the same time and manner as it's available to
10 our own service reps.

11 How the carriers use that pre-ordering data and
12 combine that with the ordering process through EDI is then
13 a business decision they have to make, whether they wait on
14 the evolving national standard that we believe is going to
15 happen for pre-ordering, whether they accept AT&T's version
16 called EC-Lite and integrate that with their systems or
17 whether they do something else. We believe our commitment
18 was to make the data available, to provide access to the
19 pre-ordering operating support systems in substantially the
20 same time and manner and not to do the integration for
21 them.

22 We did, for the small carriers, produce the
23 integrated solution called LENS that includes both ordering
24 and pre-ordering believing that some of the small carriers
25 would not want to adapt to their systems or commit to that

1 work effort on their own. So we have made a series of
2 tools available that range from very simple to very complex
3 that the carriers have access to the OSSs through, and
4 they've got to pick how that fits into their business model
5 and implement that as their own choice.

6 Q I would like to refer you now to page 28 in your
7 direct testimony, looking in lines 2 through 7. You state
8 there that BellSouth has collected data that would compare
9 its performance to ALECs with BellSouth's performance to
10 its own retail customers. Could you explain, why didn't
11 BellSouth include a comparison of CLECs in Florida to
12 BellSouth in Florida in exhibit WNS-F?

13 A No, I can't explain why we didn't do that. I
14 don't remember when we were preparing that exhibit why
15 Florida was not brought into that comparison.

16 Q Does BellSouth have this information?

17 A The data is available. It will have to be
18 reassembled in this format, but it is available.

19 Q We would like that as another late-filed
20 exhibit. I noticed that --

21 MS. WHITE: Wait a minute. Let me just make sure
22 I have the right stuff. So you want to add to WNS-F
23 information for BellSouth in Florida?

24 MS. CULPEPPER: Correct.

25 BY MS. CULPEPPER:

1 Q Not necessarily.

2 A Okay, I'm not clear.

3 Q Well, let's limit it to OSS. That may be easier.

4 A Okay. For instance, in my direct testimony I
5 described that we were preparing a measurement for the
6 response time from the navigator contract to the
7 pre-ordering systems to how long does it take from the time
8 you actually request the data until that data is returned
9 to you. That is a category of an OSS measurement. There
10 is an existing measurement in place for BellSouth today
11 from that point. I am putting a similar measurement in
12 place for LENS users from that point for the existing
13 pre-ordering system and for EC-Lite users from that same
14 point so that in the future we will be able to directly
15 compare that data.

16 Q What other functions are now measured in addition
17 to the one you mentioned?

18 A The other functions that are now measured are
19 system capacity limit functions. We look at the capacity
20 of each of the systems on a regular basis and determine
21 whether additions to those systems are required.

22 Q Okay. Moving now to the systems that have been
23 and are being developed for competitive purposes. How
24 often do you make changes to the LENS system?

25 A We make changes to the LENS system regularly.

1 Normally, weekly. We will be moving that over time to an
2 eight-week window of systematic changes, but we are not
3 there yet in terms of software development.

4 Q Do you have an anticipated date where you would
5 be changing that?

6 A When we change the process? It's an internal
7 target. It's not a date, but from the software development
8 cycle, it appears to me that we will have satisfied enough
9 of the CLECs' needs and requests for changes that if our
10 current experience is true that somewhere between now and
11 the end of the year we'll be able to move to a more normal
12 development cycle, which is about eight weeks. But as I
13 have stated earlier, the changes that occurred are driven
14 by customer demands; and if a new set of demands comes in
15 at some point in time, we may have to accelerate that.

16 Q So this is in its development and learning
17 process and it hasn't yet firmed up to the point where
18 people have stopped asking for changes?

19 A And probably never will. BellSouth's existing
20 retail systems that provide similar functions have been in
21 place, in the case of RNS, one we talked about earlier, has
22 been in place for five years. They still do changes every
23 four weeks. It depends on the users of the system and
24 their desires and needs.

25 Q So if I understand it correctly, right now

ATTACHMENT 14



James P. Lamoureux
Attorney

Room 4066
1200 Peachtree St., N. E.
Atlanta, GA 30309
404 810-4196
FAX: 404 810-8629

May 14, 1997

RECEIVED

MAY 14 1997

VIA HAND DELIVERY

Ms. Terri M. Lyndall, Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334

EXECUTIVE SECRETARY
G.P.S.C.

Re: DOCKET NO. 6352-U Petition of AT&T for the Commission to Establish
Resale Rules, Rates, Terms and Conditions and the Initial Unbundling of Services

Dear Ms. Lyndall:

Enclosed for filing in the above-referenced matter are the original and
twenty-seven (27) copies of **AT&T's Response to BellSouth's April 15,
1997 Monthly Surveillance Report for Electronic Interfaces** in the above-
referenced docket.

Please stamp the copies, returning two to me. Copies have been served
upon all parties of record as shown on the attached certificate of service.
Thank you for your assistance in this matter.

Sincerely,

James P. Lamoureux

Enclosures

cc: Hon. Stan Wise, Chairman
Hon. Dave Baker
Hon. Robert B. Baker
Hon. Mac Barber
Hon. Bob Durden
Nancy G. Gibson, Esq.
All Parties of Record

AT&T's Response

to BellSouth's April 15, 1997

Monthly Surveillance Report for Electronic Interfaces

This document provides AT&T's response to BellSouth's electronic interface report on a report category basis. The purpose of this document is to provide the Georgia Public Service Commission (the Commission) information which AT&T believes will clarify and amplify the Commission's understanding of facts and issues relating to the provision of electronic interfaces by BellSouth to AT&T.

AT&T intends to file responses to BellSouth's reports on a monthly basis.

Introduction (Page 3 of BellSouth Report)

BellSouth States:

"Because the interfaces BellSouth has implemented to date or expects to be available by April 30, 1997 provide nondiscriminatory access to BellSouth's systems, BellSouth disagrees with AT&T's suggestion that these interfaces are "interim" in nature."

AT&T Response:

AT&T takes issue with this statement for two reasons:

1. The Georgia Public Service Commission, not AT&T, determined the interfaces provided by BellSouth as a result of orders in Docket 6352-U to be interim:
 - The Commission's initial order in Docket 6801-U (page 23) states that "the Commission finds that the interfaces developed to date comply with the Commission's previous Orders and therefore are found to be sufficient to meet AT&T's interim requirements".
 - Also, in its Supplemental Order in Docket 6801-U (page 7), the Commission stated, "Docket 6352-U provided deadlines primarily for interim electronic interfaces; for permanent interfaces, the Commission generally directed the Parties to continue to work with the industry Ordering and Billing Form ("OBF)". Further in the Supplemental Order, the Commission also found it "appropriate to apply to the AT&T-BellSouth interconnection agreement in Georgia the same terms and conditions, including the deadline of December 31, 1997 for permanent interfaces, contained within the referenced BellSouth best and final offer in Tennessee and adopted by the Tennessee Regulatory Authority."
 - Further, in its Order in Docket 7253-U (page 28), the Commission stated "In addition, the pre-ordering and ordering interim "web" interfaces, and the interfaces for maintenance and repair, are not projected to be fully operational for roughly two months".

The Commission has never found that BellSouth's "interim" interfaces satisfied the requirements of the Act and its implementing regulations. In Docket 6801-U, the Commission found that "the interfaces developed to date comply with the Commission's previous Orders' and therefore are found to be sufficient to meet AT&T's interim requirements". The Commission never suggested that BellSouth's interfaces were adequate permanent interfaces. To the contrary, the Commission found "that AT&T's request [for permanent interfaces] is completely consistent with the FCC regulations,

* These previous orders referred to by the Commission applied only to resold services and did not address electronic interfaces for ordering unbundled elements, which are required by the Act and the FCC. The Commission's previous orders were issued in June and July of 1996, in advance of the issuance of the FCC regulations for operational interfaces.

which provide that incumbent LECs must provide non-discriminatory access to their operations support systems." Indeed, if the Commission had found the interfaces being developed by BellSouth as a result of Docket 6352-U to meet the requirements of the Act and the implementing regulations, it would have had no reason to find AT&T's request (for different interfaces) consistent with FCC regulations and it would not have ordered that the interfaces requested by AT&T be provided.

It is also important to note that the interconnection agreement between AT&T and BellSouth, which the Commission approved as being consistent with Sections 251 and 252 of the Act, requires not only that interim operational interfaces be provided, it also requires that permanent operational interfaces be provided by BellSouth. AT&T believes, if properly implemented, these permanent operational interfaces, and only these permanent operational interfaces, will be non-discriminatory as required by the Act and the FCC.

2. The interfaces BellSouth has implemented to date do not provide nondiscriminatory access to BellSouth's systems.

BellSouth has provided no real evidence to this Commission to support its claim that its interfaces provide non-discriminatory access to BellSouth's Operational Support Systems (OSS). The Commission's Order in Docket 7253-U made that perfectly clear. Indeed, the Commission found in its summary of major findings and conclusions in its Order in that docket (page 10) that, "For unbundled access to network elements and for resale, BellSouth has not yet demonstrated that it is able to provide access to operational support systems ("OSS") on a nondiscriminatory basis that places CLECS at parity with BellSouth." Underscoring the importance of this need for evidence of nondiscriminatory access, the Commission further stated in its Order (page 29) "However, internal testing has not yet begun for some of the interfaces; and it is not yet known what standards for reliability BellSouth used for its internal testing, although comparative standards must be evaluated to ensure that the interfaces provide non-discriminatory access."

Following are some illustrative key deficiencies in BellSouth's current operational support systems:

- As several State Commissions have found, web-based interfaces do not meet the requirements of Section 251 or its implementing regulations. For example, the South Dakota Public Utilities Commission found that the web-based interface is a "human interface," provides "inferior" service, and "does not comply with the federal Act or the FCC First Report and Order." South Dakota Public Utilities Commission, Findings of Fact and Conclusions of Law Order, Docket No. TC96-184, at 25 (Mar. 20, 1997). Similarly, the North Dakota Public Service Commission found that "the web-based interface does not meet the requirements of the FCC's First Report." North Dakota Public Service Commission, Arbitrator's Decision, Case No. PU-453-96-497, at 57 (Mar. 19, 1997). Likewise, the Montana Public Service Commission found merit in each of AT&T's criticisms regarding the deficiencies in the web-based

interface. Montana Public Service Commission, Arbitration Decision and Order (No. 5961b), Docket No. D96.11.200, at 56 (Mar. 20, 1997). These deficiencies included: (i) that "the web page solution is a human interface and is prone to error;" and (ii) "the web page solution provides service inferior to that which U.S. West provides itself." Id. at 55.

- Based on AT&T's experience in attempting to order unbundled network elements, access to operational support systems, as well as basic methods and procedures for ordering unbundled network elements are completely inadequate and discriminatory. Processes for the exchange of usage data to bill other carriers do not exist.
- Both Local Exchange Navigation System (LENS) and Trouble Analysis Facilitation Interface (TAFI) are proprietary systems, which allows BellSouth to make unilateral changes to its systems. Once such changes are made, users must change their own systems to remain compatible, or if they are operating in a human to machine mode, retrain their employees at the whim of BellSouth's decision to make changes. BellSouth has provided no change management process for these interfaces by which users can incorporate such changes into their operations. To the contrary, the rate of unilateral and uncoordinated changes to LENS is accelerating. BellSouth advised AT&T on May 5 that changes to LENS would occur frequently (it was currently producing two releases a week to correct existing errors at the time of the May 5 demonstration to AT&T) and would continue at least monthly until the end of the year. BellSouth also advised AT&T that the old releases of LENS would not be available for use once the new releases were in production. The current and planned instability of the LENS design by BellSouth renders the specifications provided to AT&T on April 25 unusable, and furthermore it is not feasible for AT&T to attempt to build a machine-to-machine interface in such an extremely unstable environment. (See more about AT&T's efforts to receive LENS information in a machine-to-machine format on pages 8-10 of this report)
- BellSouth's LENS interface is discriminatory because it requires human intervention, and does not provide the same capabilities to new entrants that BellSouth's operational support systems provide to itself. Some examples of dissimilar capability include:

—Other than order due date, it is not possible to make changes to pending orders.

—Access to Customer Service Records are not available in LENS.

--Access to telephone number availability is limited.

--Due dates are manually calculated based on standard intervals in an inquiry mode.

- Access to valid street address information is not provided in an inquiry mode.**
- Zip code information is not available.**
- UNE information transmitted through LENS must be included in the Remarks section of the order, which means it must be handled manually by BellSouth.**

In addition to the some of the discriminatory characteristics of LENS noted on the previous page, following are additional deficiencies in LENS' general availability that AT&T was made aware of during a demonstration of LENS on May 5 provided by BellSouth to AT&T.

- No LENS User's Guide is available to train employees or establish methods and procedures.**
- IDs are required to use the system, but BellSouth will not have an ID administration group in service until June 1. The existing ad hoc method of obtaining IDs for access to other data bases through the Account Team has proven to be inefficient and very slow.**
- Other than the order due date, it is not possible to make changes to pending orders.**
- No data was available on the quality of the access and whether LENS will provide parity. Of equal importance, BellSouth has provided no data as to the performance of its own operational support systems. This renders it impossible to compare the access provided by LENS with the access BellSouth provides itself to its operations support systems to determine whether the performance of LENS is non-discriminatory. According to BellSouth, it is looking at a method to track and document response time for LENS.**
- There was no compatibility check for features selected. A new entrant could select features to go on a telephone line that would not work with that line.**
- Glitches occurred, such as; the ESSX Features file would not open, and an attempt to search for sequential numbers timed out and could not be performed.**

Introduction (Page 3 of BellSouth Report)

BellSouth States:

"BellSouth is willing to work with AT&T to include information about the development of the interfaces requested by AT&T in future monthly surveillance reports."

AT&T Response:

The Order in Docket 6801-U at page 23 states that "The Commission rules that AT&T and BellSouth shall continue to comply with the Commission's orders in Docket 6352-U, including the requirement to file monthly surveillance reports to update the Commission on the development and implementation of these electronic interfaces". AT&T approached BellSouth regarding the filing of joint reports to keep the Commission apprised of the status of implementation of the permanent interfaces required by the AT&T/BellSouth interconnection agreement as required by the Commission in its Order. BellSouth subsequently offered the following procedure, which AT&T accepted:

- BellSouth will prepare the initial draft of the joint report to be filed by the 15th of each month reporting the results of the prior month.**
- BellSouth will provide a copy of the draft to AT&T by the 5th of each month for review and comment.**
- The first report to include the status of the permanent interfaces will be filed July 15.**

Details on matters such as report format, reporting of differences in views between the two companies, etc. have not yet been completed.